

RECEIVED
FEDERAL ELECTION
COMMISSION

2016 NOV 7 PM 4:05
BEFORE THE FEDERAL ELECTION COMMISSION
999 E Street, NW
Washington, DC 20463

RECEIVED
FEC MAIL CENTER
2016 NOV -7 PM 12:19

OFFICE OF GENERAL

VERIFIED COMPLAINT OF JILL STEIN

STATE OF MD

COUNTY OF Baltimore

ss.

MUR # 7193

JILL STEIN, having first been duly cautioned and sworn, deposes and says that:

1. I am at least 18 years of age and am otherwise competent to make this verified complaint.
2. The statements that I make in this verified complaint are based upon my personal knowledge, or upon information which I believe to be true.
3. I have been nominated by the Green Party as its candidate for election to the office of President of the United States, in the General Election being held on November 8, 2016.
4. In a July 2015 memo addressed to Hillary Clinton, her campaign laid out plans for working with the Democratic National Committee and Correct the Record (hereinafter "CTR"), a Super PAC. Correct the Record was created by David Brock, a longtime Clinton ally and the founder of Media Matters for America. One section of the memo instructed: "Work with CTR and DNC to publicize specific GOP candidate vulnerabilities."
5. In October 2015, several Clinton staffers strategized over ways to attack author Ed Klein for attributing an apparently fake quote to former President Bill Clinton in his book. "I'm sure Brock and team would love to go at him. Nick, want me to put you in touch with them?" Clinton campaign communications staffer Christina Reynolds, wrote, referring to Clinton press secretary Nick Merrill. "I can reach out to David," volunteered Karen Finney, another Clinton staffer on the email chain.

6. A month later, Reynolds e-mailed a list of agenda items for an upcoming campaign meeting. High on the list: determining how to frame Bernie Sanders, and whether attacks on Republicans "should go through HRC, surrogates, DNC, CTR," another reference to Correct the Record.

7. In December 2015, Mary Pat Bonner, a fundraiser for multiple pro-Clinton Super PACs, e-mailed John Podesta, the campaign's chairman, with a suggested seating chart for an event with Super PAC donors. "John, Below is the seating chart for this evening and attached is a best of hits for both Correct the Record and American Bridge on the Presidential." Campaign finance records show four donors on Bonner's list have given \$725,000 to American Bridge 21st Century, which conducts opposition research against Republicans. One donor on the list has contributed \$125,000 to Correct the Record. Bonner included a document highlighting the work done by Correct the Record. The document asserts the group may "coordinate directly and strategically with the Hillary campaign."

8. In another e-mail that month, Bonner requested Podesta speak to an adviser to Jim Simons, a hedge fund manager who was considering donating to Correct the Record. "He told me he is intending to call you on Monday to discuss the importance of CTR and their donation," Bonner wrote. "He is interested in the fact that CTR is a coordinated PAC that does not do any paid communication." (Simons has not donated to CTR.)

11. On January 4, 2016, Nick Merrill, e-mailed Christina Reynolds and other Clinton staffers that:

They are now going to put the Huma piece on the website on Wednesday morning, and it will hit newsstands on the 12th.

I think we should do a call about this and figure out how we're going to rally the troops to defend whatever nonsense is in there. We will need to engage CtR and Media Matters as well. If the primary focus of the piece is the Muslim Brotherhood nonsense, then we can more easily line up women MoC's to go after VF and defend Huma pretty aggressively I'd imagine. If the Teneo/SGE stuff has anything new or noteworthy in it, that will make life a little more difficult, and will require a little more hand to hand combat with press.

12. These e-mails show consistent, repeated efforts by the Clinton campaign to collaborate with Super PACs on strategy, research, attacks on political adversaries and fundraising.

13. On May 15, 2015, general counsel Marc Elias sent a memo to Hillary Clinton that:

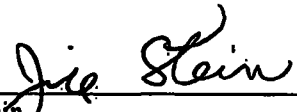
Correct the Record ("CTR") announced this week that it will operate in coordination with Hillary for America. CTR will disseminate all of its communications via email, its own websites, and "free" social media channels (e.g. Facebook, Twitter, YouTube). It will not pay for digital communications and it will not pay for broadcast advertisements, phone banks, mass mailings, or canvassing programs.

CTR's expenditures are mostly for activities like opposition research, message development, surrogate training, reporter pitches, media booking, video production, "rapid response" press outreach, and other "earned media". Any such expenditures made in "cooperation, consultation,

or concert with or at the suggestion of Clinton's campaign constitute improper in-kind contributions to the campaign.

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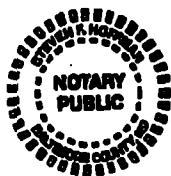
Respectfully submitted,



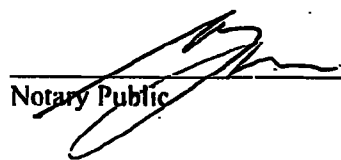
Jill Stein
P.O. Box 260197
Madison, WI 53726

VERIFICATION

The foregoing Verified Complaint was sworn to and subscribed by Jill Stein before me, a
Notary Public, this 27th day of November, 2016.



Steven F. Hoffman
Notary Public
Baltimore County, MD
My Commission Expires
2/3/19


Notary Public

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